

Annual 47 C.F.R. Section 64.2009(e) Customer Proprietary Network Information (CPNI)
Operating Procedures Compliance Statement
EB Docket 06-36

This *Operating Procedures Compliance Statement* for Cordova Telephone Cooperative, Inc (CTC) explains how CTC's procedures ensure that the CTC is in compliance with the requirements set forth in Section 64.2001 *et seq* of the Commission's rules.

- A. Cordova Telephone Cooperative will provide notice to customers of their right to restrict use of, disclosure of, and access to their CPNI is provided prior to solicitation for customer approval.
- B. All CTC employees will be trained annually on the Operating Procedures for properly safeguarding all CPNI. Cordova Telephone Cooperative, Inc. holds occasional training sessions for employees reviewing when they are and are not authorized to use or disclose CPNI, followed by a supervisory review process regarding compliance with CPNI rules. CTC also sends, via company email or other methods the Company choose to employ, information to employees relating to CPNI compliance.
- C. Every employee of Cordova Telephone Cooperative has a duty to protect the confidentiality of CPNI. A violation of the Company's operating procedures will result in disciplinary action. For a first violation, an employee will be given a warning and the violation will be noted on the employee's record. An employee will be subject to termination of employment for a second violation.
- D. The Company maintains records of our own and our affiliates' sales and marketing endeavors that use customer CPNI, including instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. Our records describe the event, the specific CPNI that was used in the event, and what products and services were offered as a part of the marketing and sales event. CTC retains records for a minimum of one year.
- E. Cordova Telephone Cooperative has established a review process for ensuring compliance with CPNI rules related to marketing activities. CTC's sales force and marketing personnel obtains approval of requests for CPNI information. Specifically, use of CPNI obtained from the CTC's provision of one service category to market a second service category to individuals or businesses that are not already customers of that second service category is strictly prohibited.
- F. For safeguarding CPNI, CTC employs reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Company employees follow procedures designed to authenticate all customers prior to disclosing CPNI based on customer-initiated telephone contact or in-person visits.
- G. Cordova Telephone Cooperative will notify a customer immediately of account activity involving a change to an address of record. Notification may be sent by email, voicemail, text message or US Mail to both the customer's prior and updated address of record.
- H. In establishing a password, CTC authenticates the customer without the use of readily available biographical information, or account information. The Company has a back-up plan in the event of a lost or forgotten password, however if a customer cannot provide the correct password or the correct response for the back-up authentication method, the customer must establish a new password.
- I. As required by CPNI rules and as outlined in Cordova Telephone Cooperative's operating procedures, law enforcement notification procedures are strictly adhered to. Should any breach of CPNI integrity be discovered, CTC will develop and maintain a record as to the date of the breach discovery, who discovered the breach, and the resulting notifications to the United States Secret Service and the Federal Bureau of Investigation no later than 7 days from the date of the discovery of the breach. The records of these discovered breaches will be maintained and held by CTC for no less than (3) years.

Signed


Jeremiah Beckett, CEO/ General Manager

Date

2/19/18